

Matthew A. Feldman
Paul V. Shalhoub
Robin Spigel
Debra C. McElligott
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111

Counsel for the Plan Administrator

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re: : Chapter 11
:
SquareTwo Financial Services : Case No. 17-10659 (JLG)
Corporation, et al.,¹ :
:
Reorganized Debtors. : (Jointly Administered)
-----X

**NOTICE OF PRESENTMENT OF ORDER
PURSUANT TO BANKRUPTCY CODE SECTION 105(a)
AND BANKRUPTCY RULES 9006 AND 9027 FURTHER
EXTENDING TIME FOR REMOVAL OF POSTPETITION
NON-BANKRUPTCY CLAIMS AND CAUSES OF ACTION**

PLEASE TAKE NOTICE that upon the annexed motion of Thomas M. Kim, as Plan Administrator, the undersigned will present the attached proposed order (the “**Proposed Order**”) for signature to the Honorable James L. Garrity, Jr., United States Bankruptcy Judge, Courtroom 601, at the United States Bankruptcy Court for the Southern District of New York,

¹ The debtors that commenced these chapter 11 cases (collectively, the “**Debtors**”) and the last four digits of each such Debtor’s federal taxpayer identification number and/or Canadian equivalent are as follows: Astrum Financial, LLC (2265); Autus, LLC (2736); CA Internet Marketing, LLC (7434); CACH, LLC d/b/a Fresh View Funding (6162); CACV of Colorado, LLC (3409); CACV of New Jersey, LLC (3499); Candeo, LLC (2809); CCL Financial Inc. (7548); Collect Air, LLC (7987); Collect America of Canada, LLC (7137); Healthcare Funding Solutions, LLC (2985); Metropolitan Legal Administration Services, Inc. (6811); Orsa, LLC (2864); Preferred Credit Resources Limited (0637); ReFinance America, Ltd. (4359); SquareTwo Financial Canada Corporation (EIN: 1034; BN: 0174); SquareTwo Financial Corporation (1849); and SquareTwo Financial Services Corporation d/b/a Fresh View Solutions (5554).

One Bowling Green, New York, New York 10004, or such other location as designated by the Bankruptcy Court, on **September 25, 2017 at 12:00 noon (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to entry of the Proposed Order must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, be filed with the Court (with two single-sided hard copies delivered to the Judge's Chambers), and be served in a manner as will cause such objection to be **received by September 18, 2017 at 4:00 p.m. (prevailing Eastern Time)** (the "**Objection Deadline**") by: (i) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, NY 10019 (Attn: Matthew A. Feldman, Esq. and Debra C. McElligott, Esq.), counsel for the Plan Administrator; (ii) the United States Trustee for Region 2, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Susan A. Arbeit, Esq. and Richard C. Morrissey, Esq.); and (iii) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Alan W. Kornberg, Esq. and Elizabeth R. McColm, Esq.), counsel to certain lenders party to the Debtors' prepetition 1.5 lien credit agreement.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are received by the Objection Deadline, the Proposed Order may be entered without further notice or a hearing. If an objection is filed, you may be notified of a hearing to consider the relief requested.

Dated: September 7, 2017
New York, New York

WILLKIE FARR & GALLAGHER LLP
Counsel for the Plan Administrator

By: /s/ Paul V. Shalhoub

Matthew A. Feldman

Paul V. Shalhoub

Robin Spigel

Debra C. McElligott

787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111